

Ivan G. McKinney #60132/
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U.S. District Court

Newark Vicinage
Attn. Hon. Judge Michael Hammer U.S.D.J.

50 Walnut Street
Newark, NJ 07101

McKinney v. Nurse Cuccinella
Docket No: 2:15-cv-
07442 (ICM)(MAH)

March 28, 2019

Dear Hon. Judge Hammer:

I have tried to negotiate a settlement offer in the above case with defendant's Counsel. This was over several months to no avail. I am asking this court to allow me to depose OFF. Joseph Savino as-per 50 questions.

And I am asking the court to provide me a Subpoena to allow me to ask Bergen County Superior Court for certain items of discovery. And I also would like to depose David

Calviello Asst ~~Super~~ Prosecutor, Kathy Fantuzzi,
Asst Prosecutor, Dana Acardi court clerk,
Hon. Judge Guida J.S.C. This request
was made by me in the pass. I did
my due diligence at the time. But, I
found out a hand written subpoena was
not the way. I didn't know, I'm not a
lawyer. Also, both I and Counsel tried to
negotiate a settlement for several months so the
discovery somewhat stopped. Counsel last letter
to your honor was me a little hot. In no
way did I waive my right to discovery of
your last order. Or deposing Savino, or any
of the others. We were negotiating so we both
stopped the request. And for Counsel to say I
waived anything is totally wrong. Counsel sent
me that letter on JPAY.com. I told him on the
phone I need a copy and he never sent it.
I must say Counsel has shown me some
ways that are new and not like him. I
am asking this court to allow to go forw
ard. And/or help us schedule a settlement conference.
Counsel has not put a number on the table he keep
beating around the bush. And claiming he submitted the
offer to Bergen County sheriff or Counsel I believe. Thank
you Your honor for your time. Sincerely yours
Duan M. C.

P.S. The institution keeps playing with my legal conferences
phone/video

cc:
Leonard
Seaman
ESQ.

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The Law Offices of Richard
Malagiere P.C. Attn. Mr. Leonard Seaman ESQ.
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Moonachie, NJ 07074

McInney v. Cuccinella
Docket # 2:15-cv-07
442 (K.M.) (MAH)

Dear Mr. Seaman: 03-28-19

I have enclosed a copy of this 2 Page
03-28-19 letter to Hon. Judge Hammer.
It entails our negotiations. And my
concern on how you have been operating.
Thank You for Your time.

CC:
Hm

James H. O'Connell

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